

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

GERARDO CAMPOS, ET AL.,	:	
	:	
Plaintiffs,	:	CASE NO. 3:12-cv-01529-ADC-BJM
	:	
v.	:	
	:	
SAFETY-KLEEN SYSTEMS, INC., ET AL.,	:	
	:	
Defendants.	:	

**DEFENDANT SAFETY-KLEEN SYSTEMS, INC.’S MOTION FOR LEAVE TO FILE  
REPLY IN SUPPORT OF EVIDENTIARY OBJECTIONS TO EVIDENCE  
AND MOTION TO STRIKE EVIDENCE IN SUPPORT OF PLAINTIFFS’  
MOTION FOR SUMMARY JUDGMENT (ECF No. 139)**

TO THE HONORABLE COURT:

COMES NOW, DEFENDANT SAFETY-KLEEN SYSTEMS, INC. (“Safety-Kleen”), through the undersigned attorneys, and respectfully requests leave to file its Reply to Plaintiffs’ Response in Opposition (160) to Defendant Safety-Kleen Systems, Inc.’s Evidentiary Objections to Evidence and Motion to Strike Evidence (139) in Support of Plaintiffs’ Motion for Summary Judgment, filed simultaneously herewith, and states as follows:

1. On July 16, 2014, Safety-Kleen filed its Evidentiary Objections to Evidence and Motion to Strike Evidence in Support of Plaintiffs’ Motion for Summary Judgment (ECF No. 139; hereinafter “Objections to Plaintiffs’ Evidence”).

2. On August 11, 2014, Plaintiffs filed their Response in Opposition to Safety-Kleen’s Objections to Plaintiffs’ Evidence (ECF No. 160), which sets forth arguments requiring clarification and rebuttal. In order to ensure a full and accurate record, Safety-Kleen hereby requests leave to file a Reply to Plaintiffs’ Opposition.

WHEREFORE, for the reasons states herein, Safety-Kleen respectfully requests that leave be granted to file a Reply to Plaintiffs’ Response in Opposition (160) to Defendant Safety-

Kleen Systems, Inc.'s Evidentiary Objections to Evidence and Motion to Strike Evidence (139) in Support of Plaintiff's Response in Opposition to Safety-Kleen's Motion for Summary Judgment and for all just and other relief this Court deems necessary.

**RESPECTFULLY SUBMITTED**, this 20th day of August, 2014.

Respectfully submitted,

JONES CARR M<sup>c</sup>GOLDRICK, L.L.P.

/s/ Amanda M. Koch  
James J. M<sup>c</sup> Goldrick  
Texas State Bar No. 00797044  
Jeffrey F. Wood  
Texas State Bar No. 24025725  
Amanda M. Koch  
Texas State Bar No. 24051089  
Heather J. Forgey  
Texas State Bar No. 24048628  
5910 N. Central Expy., Ste. 1700  
Dallas, TX 75206  
Phone: (214) 828-9200  
Fax: (214) 828-9229  
[James.mcgoldrick@jcmfirm.com](mailto:James.mcgoldrick@jcmfirm.com)  
[Jeff.wood@jcmfirm.com](mailto:Jeff.wood@jcmfirm.com)  
[Amanda.koch@jcmfirm.com](mailto:Amanda.koch@jcmfirm.com)  
[Heather.forgey@jcmfirm.com](mailto:Heather.forgey@jcmfirm.com)

and

Giancarlo Font-García  
RIVERA-CARRASQUILLO, MARTÍNEZ & FONT  
P.O. Box 9024081  
San Juan, PR 00902-4081  
Phone: (787) 622-6999

ATTORNEYS FOR DEFENDANT  
SAFETY-KLEEN SYSTEMS, INC.

**CERTIFICATE OF SERVICE**

On August 20, 2014, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, District of Puerto Rico, using the ECF system. I hereby certify that I have served all counsel and/or *pro se* parties of record electronically or by another

manner authorized by Federal Rule of Civil Procedure 5(b)(2).

By:           /s/ Amanda M. Koch            
**Amanda M. Koch**